

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

v.

24-CV-

\$30,695.00 UNITED STATES CURRENCY SEIZED  
FROM JP MORGAN CHASE BANK, N.A.,  
ACCOUNT NO. 3982871197,

Defendant *in rem*.

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**VERIFIED COMPLAINT FOR FORFEITURE**

The United States of America, by its attorneys, Trini E. Ross, United States Attorney for the Western District of New York, and Mary Clare Kane, Assistant United States Attorney, of counsel, for its Verified Complaint herein alleges as follows:

**CAUSE OF ACTION**

1. This is an action *in rem* pursuant to Title 21, United States Code, Section 881(a)(6) for the forfeiture of the sum of \$30,695.00 in United States currency (hereinafter “defendant currency”), which was seized from JP Morgan Chase Bank, N.A., Account No. 3982871197 on or about August 11, 2023 pursuant to a Federal Seizure Warrant.

2. The defendant currency was converted to a check and deposited into an account under the custody of the United States Marshals Service (“USMS”), Buffalo, New York, and is held within the jurisdiction of this Court.

**JURISDICTION AND VENUE**

3. This Court has subject matter jurisdiction of this action commenced by the United States pursuant to Title 28, United States Code, Section 1345 and over an action for forfeiture pursuant to Title 28, United States Code, Section 1355(a). This Court has *in rem* jurisdiction pursuant to Title 28, United States Code, Sections 1355(b) because the acts or omissions giving rise to the forfeiture occurred in the Western District of New York. Venue is properly premised in the Western District of New York pursuant to Title 28, United States Code, Section 1395, because the defendant currency is currently in the custody of the United States Marshals Service for the Western District of New York.

**FACTS**

4. The facts and circumstances supporting the forfeiture of the defendant currency are contained in the Affidavit of John M. Skonecki, Task Force Officer of the Drug Enforcement Administration, a copy of which is attached hereto as Exhibit 1 and incorporated as though fully set forth herein and has been provided to the Court with an application that it remain under seal under further Order of the Court.

**INITIATION OF CIVIL JUDICIAL ACTION**

5. On or about November 3, 2023, the Drug Enforcement Administration received a claim to halt the administrative forfeiture proceedings against the defendant currency and requested referral for judicial forfeiture proceedings.

**CONCLUSION AND REQUESTS FOR RELIEF**

6. Based on all of the foregoing facts, the circumstances surrounding those facts, and the experience and training of the law enforcement officers involved, there is reasonable belief that the defendant currency was furnished, or intended to be furnished, in the furtherance of controlled substances distribution, and/or constitute proceeds traceable to controlled substances distribution and/or constitutes all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of controlled substances violation and is subject to forfeiture pursuant to Title 21, United States Code, Section 881(a)(6).

**WHEREFORE**, the United States of America respectfully requests that:

- (1) that an arrest warrant *in rem* be issued for the arrest of the defendant currency;
- (2) that all persons having any interest therein be cited to appear herein and show cause why the forfeiture should not be decreed;
- (3) that a judgment be entered declaring the defendant currency be condemned and forfeited to the United States of America for disposition in accordance with the law;
- (4) that the costs of this suit be paid to and recovered by the United States of America; and
- (5) that the Court grant such order and further relief as deemed just and proper.

Dated: February 1<sup>st</sup>, 2024  
Buffalo, New York.

TRINI E. ROSS  
United States Attorney  
Western District of New York

*s/Mary Clare Kane*  
By: MARY CLARE KANE  
Assistant United States Attorney  
United States Attorney's Office  
Western District of New York  
138 Delaware Avenue  
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STATE OF NEW YORK )  
COUNTY OF ERIE ) ss.:  
CITY OF BUFFALO )

John M. Skonecki, being duly sworn, deposes and says:

I am a Task Force Officer of the Drug Enforcement Administration (DEA) in the Western District of New York, and I am familiar with the facts and circumstances surrounding the seizure of \$30,695.00 United States currency from JP Morgan Chase Bank, N.A., Account No. 3982871197 on or about August 11, 2023. The matters alleged in the Verified Complaint for Forfeiture and the attached Exhibits are true to the best of my knowledge and belief and were obtained during the course of the investigation of the defendant currency and provided to the officials of the United States Department of Justice and United States Attorney's Office.

*s/John M. Skonecki*  
John M. Skonecki  
Task Force Officer  
Drug Enforcement Administration

Subscribed and sworn to before  
me this 1st of February 2024.

*s/Gabriela Kick*  
Notary Public  
**GABRIELA KICK**  
Notary Public, State of New York  
Qualified in Niagara County  
My Commission Expires: 09/04/2026